

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

UNITED STATES OF AMERICA, :  
Plaintiff, : Case No. 2:21-mj-478  
vs. : Magistrate Vascura  
CHRISTOPHER VOLDEN, :  
Defendant. :

**UNOPPOSED MOTION TO MODIFY TERMS OF PRETRIAL RELEASE**

Now comes Christopher Volden, through counsel, and moves this Court to modify the terms of pretrial release. Specifically, Mr. Volden asks this Court to remove the required condition of substance abuse treatment, namely alcohol abuse treatment.

For context, Mr. Volden was released on an OR bond with certain conditions on August 16, 2021, including participating in a program of inpatient or outpatient substance abuse therapy and counselling as directed by Pretrial. Mr. Volden subsequently followed up with an evaluation at CREATE Minneapolis. That facility recommended an outpatient service requiring 12 hours a week of therapy plus significant travel to and from treatment.

For his part, Mr. Volden recognizes the importance of maintaining his sobriety. He has not had alcohol since July 23, 2021, and has no desire to do so. Meanwhile, he is routinely tested for illicit substances and alcohol through urine screens, all of which have been negative.

Mr. Volden's been maintaining a significant work schedule that has proven effective at not only providing him with an income, but has also provided him with clarity of mind for the first time in years. His fear is that the added time commitment for the outpatient treatment will drastically cut into his ability to work, if at all. This, in turn, would add additional stress on a

situation that is already fragile from a mental health standpoint. That being said, Mr. Volden respects that he must continue to take the urinalysis tests and is happy to do so.

Michael Hunter from the US Attorney's Office has been notified and has no objection to the requested modification.

As such, Christopher Volden respectfully asks this Court to remove the requirement of the substance abuse treatment as a condition of his bond while maintaining all other conditions.

Respectfully submitted,

/s/ Soumyajit Dutta  
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*Attorney for Defendant  
Christopher Volden*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the Sentencing Memorandum was electronically served upon Michael Hunter, Assistant United States Attorney, via ECF and email on September 30, 2021.

/s/ Soumyajit Dutta  
Soumyajit Dutta (0076762)